

FACT SHEET

DRAFT HAZARDOUS WASTE PERMIT PREPARED FOR

International Paper - Deridder Facility

EPA ID# LAD 008 077 315

Agency Interest # 1249

PER20010001

Deridder, Louisiana

Beauregard Parish

Permit Number LAD 008 077 315-PC-RN-1

I. INTRODUCTION

This fact sheet has been developed in accordance with the Louisiana Administrative Code (LAC) 33:V.703.D and briefly sets forth principal and significant facts, legal, methodological and policy requirements of the proposed draft hazardous waste post-closure permit for International Paper, EPA ID Number LAD 008 077 315, Agency Interest Number 1249, for the facility located in Deridder, Beauregard Parish, Louisiana.

International Paper is seeking a hazardous waste permit governing the post-closure care of the Drip Pad, and Waste Management Areas A, B, and C. This includes Evaporation Ponds 1 and 2, Holding Pond, Wastewater Ponds 1, 2, and 3, Creosote Recovery Pond, Pentachlorophenol Recovery Pond, and Sludge Pond.

The Louisiana Department of Environmental Quality (LDEQ) has prepared this proposed draft hazardous waste permit for post-closure which addresses the requirements of LAC Title 33, Part V, Subpart 1 and the Federal Resource Conservation and Recovery Act (RCRA) as amended by the 1984 Hazardous and Solid Waste Amendments (HSWA).

II. THE PERMITTING PROCESS

The purpose of this fact sheet is to initiate the permit decision process. The Office of Environmental Services – Waste Permits Division (OES-WPD) is required to prepare this draft hazardous waste permit. The draft hazardous waste permit sets forth all the applicable conditions, which the permittee is required to comply with during the life of the permit.

The permitting process will afford the LDEQ, interested citizens, and other agencies the opportunity to evaluate the ability of the permittee to comply with the requirements of the LAC 33:V, Subpart 1, and the Hazardous and Solid Waste Amendments (HSWA) portion.

The public is given a minimum of forty-five (45) days to review and comment on the draft post-closure permit. The administrative authority, prior to making a decision or taking any final action on the draft permit, will consider all significant comments. The decision of the administrative authority shall be to issue, deny, modify, or revoke the draft post-closure permit in accordance with LAC 33:V.705.

A. DRAFT HAZARDOUS WASTE PERMIT

The Louisiana Department of Environmental Quality – Office of Environmental Services (LDEQ-OES), Waste Permits Division reviewed the permit application and other pertinent technical information, and prepared a draft permit that contains the language that pertains to the post-closure care of the listed facilities.

This draft hazardous waste permit is a tentative determination and is not the final decision of the administrative authority.

B. PUBLIC COMMENT PERIOD

LAC 33:V.715 requires that the public be given at least forty-five (45) days to comment on a draft permit decision.

The specific dates for the opening and closing of the public comment period are contained in the public notice that was issued for this particular permitting action. Any person interested in commenting on the draft permit for International Paper, Deridder Facility must do so within the allotted forty-five (45) day comment period.

Public notice of the proposed permitting action shall be published in specified newspapers, announced on the designated radio station, and mailed to those persons contained on the facility's mailing list.

C. LOCATIONS OF AVAILABLE INFORMATION

The administrative record, including all supporting documents are on file at the LDEQ Public Records Center, Room 1-127, 602 North 5th Street, Baton Rouge, Louisiana. These documents may be inspected and copied (at \$0.25 per copy page) at any time between the hours of 8:00 to 4:30 p.m., Monday through Friday (except holidays).

In addition, a copy of the draft post-closure permit, fact sheet, and supporting documents are available for review at the Beauregard Parish Library, 205 South Washington Street, Deridder, Louisiana 70634.

D. WRITTEN COMMENT SUBMISSION

Interested persons may submit written comments on the draft post-closure permit to the administrative authority, at the address listed below, no later than 12:30 p.m., on the closing date of the comment period. All comments should include:

1. the name and address of the commenter,
2. a concise statement of the exact basis for any comment and supporting relevant facts upon which the comment is based,
3. identification of the facility commented on (the EPA Identification Number and AI number), and
4. supporting relevant facts upon which the comments are based.

All comments, requests for a public hearing, further requests for information (including copies of this decision and fact sheet) and any requests by public interest groups or individuals who would like to be included in the mailing list, should be made in writing to:

Ms. Soumaya Ghosn
Louisiana Department of Environmental Quality
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313
(225) 219-3276 or fax (225) 219-3309

Any technical questions regarding this draft permit should be addressed to:

Ms. Toni Metoyer Booker
Louisiana Department of Environmental Quality
Office of Environmental Services
Waste Permits Division
Post Office Box 4313
Baton Rouge, LA 70821-4313
(225) 219-3134 or fax (225) 219-3158

III. DESCRIPTION OF OVERALL SITE

International Paper, Deridder Plant was a wood preserving facility which produced utility poles and pilings using the pressure treatment process. Creosote, pentachlorophenol (PCP), and diesel fuel were used during the facility's operation. A drip pad and nine unlined surface impoundments were used for recovery and evaporation of wood preservatives. The plant terminated operations in September 1997. The constituents of concern (COC) detected on the

property are creosote constituents and PCP. The media impacted by the COCs are soil and groundwater. International Paper was issued a post-closure permit for Waste Management Areas A, B, and C by the Louisiana Department of Environmental Quality on January 25, 1991. International Paper subsequently appealed the permit decision to change the requirements for groundwater monitoring and insurance.

On May 3, 2001, LDEQ issued a Draft Modified Post-Closure permit for public notice. Since the Modified Post-Closure permit was based upon an application submitted in 1985, and operations at the facility were discontinued in 1997, the document no longer reflected current conditions at the site. Therefore, the LDEQ agreed to act on an August, 2001 Permit Renewal application, and did not move forward with the Draft Modified Post-Closure Permit. The 2001 submittal included an additional unit to be permitted referred to as the Drip Pad.

IV. HAZARDOUS WASTE FACILITIES

The units covered by the proposed post-closure permit are the Drip Pad, and Waste Management Areas A, B, and C.

Waste Management Area A, operated from 1972 to 1982, is located on the northern part of the site. Closed units include a holding pond and two evaporation ponds. Investigations discovered groundwater contamination in the Bentley Sand from the closed units. Recovery wells are collecting groundwater with dissolved creosote constituents, and one well is recovering free phase creosote. The facility is currently performing an evaluation of the effectiveness of the recovery system for this unit.

Waste Management Area B is located near the process area and was operated from 1937 to 1982. The closed units include a pentachlorophenol recovery pond, a creosote recovery pond and three wastewater ponds. Investigations have discovered groundwater contamination in the Bentley Sand from the closed units. Recovery wells are collecting groundwater with dissolved creosote constituents, and two wells are recovering free phase creosote. The facility is currently performing an evaluation of the effectiveness of the recovery system for this unit.

Waste Management Area C was operated from 1937 to 1982. It was a sludge disposal pond located to the southwest of the process area. The pond was utilized for disposal of sludge removed from the PCP and Creosote recovery ponds.

The Drip Pad Area is located adjacent to the treating area and was formerly used for removal of residual preservatives from treated wood products. The original portion of the drip pad was constructed in 1987 and a new portion was constructed in 1992. International Paper implemented an in-place closure of the drip pad in 1999.

V. FINANCIAL AND LIABILITY REQUIREMENTS

International Paper has submitted documentation to satisfy the financial assurance requirements of LAC 33:V. Chapter 37.

VI. IT QUESTION SUMMARY OF ANALYSIS

Pursuant to L.A.R.S.30:2018.E.3, this draft hazardous waste post-closure permit is not subject to the requirements regarding environmental assessment statements or IT Analysis (Save Ourselves v. Louisiana Environmental Control Commission 1152 (La.1984)). Nevertheless, the LDEQ has considered factors similar to the IT questions in preparing this draft permit. This is a preliminary analysis based on information currently available to the LDEQ.

- A. **The potential and real adverse environmental effects of the proposed project have been avoided to the maximum extent possible.**
- B. **A cost benefit analysis of the environmental impact balanced against the social and economic benefits of the project demonstrates that the social and economic benefits outweigh environmental impacts.**
- C. **There are no alternative projects or alternative sites or mitigating measures which offer more protection to the environment than the proposed project without unduly curtailing non-environmental benefits to the extent applicable.**

The facility will enter a RCRA permitted post-closure care period of thirty (30) years. During this post-closure care period, the groundwater monitoring and corrective action programs will continue. At the end of the initial thirty-year post-closure care period the groundwater around the unit will be evaluated. If it is determined that there is no future risk of contamination, the post-closure care period will end. If a risk of contamination remains, the post-closure care period will be extended.

International Paper submitted its Post-Closure Permit Application for the Deridder Facility, which includes one drip pad and Waste Management Units A, B, and C. This permit does not propose the alteration of waste classifications, codes or characteristics.

The units addressed by this application are closed and undergoing post-closure care. All aspects of the closure of the units and the post closure care are in compliance with State and Federal regulations.

This is an existing facility submitting an application for the post-closure care of its existing, closed hazardous waste storage units. International Paper been in operation for several decades. International Paper has ceased the hazardous waste processing and handling activities from the previous hazardous waste permit.

The proposed permit should have little or no affect on property values, the tax base, economic development, or public costs as they pertain to the economics of the local community. The proposed draft hazardous waste permit should not promote the need for additional fire protection, police, medical facilities, or roads.

1. ALTERNATIVE PROJECTS

This draft permit is for the post-closure of four hazardous waste storage units. There appears to be no known alternative projects that would offer more protection to the environment than issuing a post-closure permit for the closed units without unduly curtailing non-environmental benefits.

2. ALTERNATIVE SITE

This draft permit is for an existing facility. The hazardous waste units to be permitted were treatment and disposal units for hazardous waste that was generated on-site. Since post-closure care requirements are in place at the facility, relocating these units to a different existing or new location could result in greater environmental impact due to siting and transportation considerations, as well as increased hazardous waste production and transportation.

3. MITIGATING MEASURES

The International Paper has instituted post-closure requirements for the closed units that are protective of human health and the environment. No mitigating measures would offer more protection to the environment than permitting without unduly curtailing non-environmental benefits.